

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 31, 2002

Clifford A. Schulman, Treasurer Greenberg, Traurig, Hoffman, Lipoff, Rosen & Quentel, PA Political Action Committee 1221 Brickell Avenue Miami, FL 33121

Identification Number:

C00266585

Reference:

February Monthly (1/I/01-1/31/01), March Monthly (2/1/01-2/28/01),

April Monthly (3/1/01-3/31/01), May Monthly (4/1/01-4/30/01) and June

Monthly (5/1/01-5/30/01) Reports

Dear Mr. Schulman:

This letter is to inform you that as of January 30, 2002 the Commission has not received your response to our requests for additional information dated January 9, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate responses must be received at the Commission by February 20, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Erik Koeppen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to

reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director

Reports Analysis Division

Enclosures



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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JAN 9 2002

Clifford A. Schulman, Treasurer Greenberg, Traurig, Hoffman, Lipoff, Rosen & Quentel, P A Political Action Committee 1221 Brickell Avenue Miami, FL 33121

Identification Number:

C00266585

Reference:

June Monthly Report (5/1/01-5/31/01)

Dear Mr. Schulman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up,

## GREENBERG, TRAURIG, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P A POLITICAL ACTION COMMITTEE PAGE 2

stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Boston", "Fort Lauderdale", "Los Angeles", "Miami", "New York #1", "New York #2", "New York #3", "Philadelphia", "Phoenix", "Tallahassee", "Washington DC", "West Palm Beach", and "Wilmington".

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the

GREENBERG, TRAURIG, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P A POLITICAL ACTION COMMITTEE PAGE 3

Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Erik W. Koeppen

Eile W. Koppen

Reports Analyst

Reports Analysis Division

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